

## **MEDAL**

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Mr. Anthony Fazio  
US Department of Transportation  
Federal Aviation Administration  
800 Independence Ave. SW  
ARM -1 Room 810  
Washington, DC. 20591

RE: Letter to FAA Docket relating to an observation on the FTIHWG report.

Dear Mr. Fazio:

I am sending this letter to point out a concern I have with the Fuel Tank Inerting Harmonization Working Group Final report. Before I get into the details of my concern I would like to make it absolutely clear that this note is not a dissenting opinion of the report contents, but rather documentation of an note on the report's conclusions and recommendations from the prospective a member of the Fuel Tank Inerting Harmonization Working Group.

When I submitted my resume for consideration to be part of the Fuel Tank Inerting Harmonization Working Group, I was honored to be part of this activity and selected as part of the FTIHWG. The primary reason I wanted to become involved was to be part of a study that had the potential to make recommendations to the aviation industry that could dramatically improve the safety of fuel tanks by inerting. I felt that with Air Liquide's background in nitrogen generating technologies and our experience in fuel tank inerting on military aircraft, we had a lot to offer the working group in completing its task.

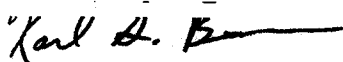
It is true that at the completion of the work and the submission of the working group report there was general consences of the working group members as defined by the ARAC operating procedures. While we may not have agreed with every detail of the report

conclusions and recommendations, all of our concerns were acknowledged by the other members of the working group and addressed as best they could. It was clear from the work completed and data gathered by the various sub-task teams that the cost of inerting the commercial aircraft fleet over the study period would exceed the benefit as calculated in our report.

Now that the FAA has the working group report and its recommendations it is clear that a decision has to be made on flammability requirements for the fuel tanks on the existing commercial fleet aircraft. I would like to point out to you an issue I noticed in the inerting cost model which is inconsistent with the report conclusions. The CY2005 NPV cost benefit ratio calculated by the model for scenario 7, OBIGGS Hybrid HCWT only for the US Passenger fleet, is 41 :1. The report recommendations indicate that the FAA, NASA, and the industry should pursue technological advancements to decrease the size, weight, performance, and reliability/maintainability of inerting systems while reducing their cost. If scenario 7 was re-run with the cost of the systems at zero and the cost to carry the weight and maintain the inerting system also at zero, the cost / benefit ratio only reduces to 18 :1. It is clear that through research improving the systems will make them better for the aviation industry if the FAA were to impart a rule where inerting were to be used for flammability management, however no amount of research will make the systems cost, weight, and maintenance requirements go to zero which does not entirely support the working group recommendations.

From my experience of being on the working group it is clear that the FAA has a difficult decision to make about the flammability of the existing aircraft fleet. I urge the FAA to strongly consider fuel tank inerting as a viable technology that will offer a significant improvement to the safety of the commercial aircraft fleet. Please include this letter into the docket along with the FTIHWG report and do not hesitate to contact me if you have any questions regarding this letter.

Regards,



Karl S. Beers